

Pro Se 7 2016

FILED	ENTERED
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MAR 12 2024 MH

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

Dominique C. Pavageau

CASE NO. 24-CV-00332-LJK
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT
DISCRIMINATION

Plaintiff(s),

v.

Jury Trial: ☐ Yes ☐ No

Delta Air Lines
Inflight Services

Defendant(s).

I. THE PARTIES TO THIS COMPLAINT

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Dominique Pavageau

Street Address

4036 S Holly Street

City and County

Seattle, WA 98118 / King

State and Zip Code

WA 98118

Telephone Number

206 928 1233

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B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Delta Air Lines

Job or Title (if known)

Street Address

1030 Delta Blvd Dept 981

City and County

Atlanta, Fulton

State and Zip Code

GA, 30354

Telephone Number

Defendant No. 2

Name

Nancy Reynolds

Job or Title (if known)

Flight Attendant

Street Address

City and County

State and Zip Code

Telephone Number

337 288 9250

Defendant No. 3

Name

Shirley Francois

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

6046 626 1282

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Defendant No. 4

Name

Natasia Cole

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

516 717 7973

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

Delta Air Lines - Inflight ~~training~~ Services

Street Address

1030 Delta Blvd

City and County

Atlanta, GA

State and Zip Code

GA 30354

Telephone Number

2

II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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B. Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name

Alvina Douglass

Job or Title (if known)

Flight Attendant

Street Address

City and County

State and Zip Code

Telephone Number

347 421 6347

Defendant No. 2

Name

Keesha Mattos

Job or Title (if known)

Flight Attendant

Street Address

City and County

State and Zip Code

Telephone Number

808 936 0613

Defendant No. 3

Name

Yadira Rodriguez -Lopez

Job or Title (if known)

Flight Attendant

Street Address

City and County

State and Zip Code

Telephone Number

323 632 9447

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Defendant No. 4

Name

Sabine Cash

Job or Title (if known)

Flight Attendant

Street Address

City and County

State and Zip Code

Telephone Number

678 536 3000

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

Delta Airlines - Inflight Services

Street Address

1030 Delta Blvd

City and County

Atlanta, Fulton

State and Zip Code

GA 30354

Telephone Number

II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to (check all that apply):

- ☐ Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

- ☐ Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

☐ Other federal law (specify the federal law):

☐ Relevant state law (specify, if known):

☐ Relevant city or county law (specify, if known):

III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

Delta Air Lines failed to interact in the accommodation process and suspended me from flight attendant training the day before my graduation.

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- ☐ Failure to hire me.
- ☐ Termination of my employment.
- ☒ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☒ Retaliation.

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☐ Other acts (specify): _____

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

September 30, 2021

C. I believe that defendant(s) (check one):

☒ is/are still committing these acts against me.

☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

☐ race _____

☐ color _____

☐ gender/sex _____

☐ religion _____

☒ national origin

Seattle, WA

☐ age (year of birth)

(only when asserting
a claim of age
discrimination.)

☒ disability or perceived disability (specify disability)

Anxiety

E. The facts of my case are as follows. Attach additional pages if needed.

I voiced my learning concerns on day 2 and 3
of training, regarding pacing of curriculum. I mentioned
to learning managers I would be filing for an accommodation.

(Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.)

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IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

10/04/2021

B. The Equal Employment Opportunity Commission *(check one)*:

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on *(date)*

12/13/2023

(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

V. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

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VI. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

3/12/2024

Signature of Plaintiff

Dany C. R.

Printed Name of Plaintiff

Dominique Pavageau

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff

Date of signing:

Signature of Plaintiff

Printed Name of Plaintiff